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Pitscottie Road, 15/03980/ARC and 000102652-003

We use the term “path” for vehicle free routes (pedestrians, cyclists, mobility scooters) and “road” for motorised vehicular routes. The term “street” is used to cover both, as is the intention in the UK document *Manual for Streets,* on which the Scottish Government guidance *Designing Streets* and the Fife Council guidance *Making Fife’s Places* are derived.

A planning proposal may be refused, and the refusal defended at appeal, solely on design grounds. On the two principal policies of Scottish Planning Policy, sustainability and placemaking, key aspects of the design of this development proposal are simply not good enough.

These failures would directly affect the amenity of occupants of the homes, and would be very difficult, and expensive, to correct once the development has been built. The most cost effective time to correct them is now. The development should be redesigned.

Specific objections to the plan as submitted

Please also see the following section entitled “Objection basis” for the legal underpinning of our objections and the “Plan conclusions” at the end.

Sustainable transport, summary

Sustainable transport (walking, cycling and public transport) is a paramount consideration. Whilst supporting the housing development in principle, we oppose the submitted plans for reasons given below:

- There are no sustainable transport desire lines within the development.
- There are no safe sustainable transport routes into the town after leaving the site.
- There are inadequate connections for sustainable transport from future development outwith the site.
- The addition of a second entrance to the site adds an unnecessary barrier to sustainable transport, especially from any future development.
- The addition of the road link to the south adds an unnecessary barrier to sustainable transport from this site and from any future development.

We conclude that this development plan makes no attempt to encourage sustainable transport and is therefore clearly contrary to Scottish Planning Policy and should be rejected.

The reason that Cupar has been designated for major growth is because it has good public transport links. This argument becomes irrelevant if new housing layouts make it difficult for residents to use public transport.

Desire lines

To encourage walking and cycling it is vital that the most direct route is available. This means a direct (straight) route to the exits from the site should be included in the plans.

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Even more important is to make sure that any future development has direct access to these (straight) sustainable routes.

Also a consideration are the contours of the site. Wherever possible paths and shared streets (roads with no pavements) should follow contour lines to avoid pedestrians and cyclists having to go up and down slopes unnecessarily.

There is a significant difference between shared street design requirements which must have a convoluted layout to slow traffic, and pedestrian and cycle paths which need to be as straight as possible for safety reasons. The same route cannot achieve these contrary objectives, so a development of any size must include both.

Routes into town

It is unacceptable to put on the plan a "possible future link to footpath network" when the amount of land required for this is trivial and permission should not be granted until this route is contractually secure.

We understand that there is an additional plan to include a 2m wide pavement as far as Tarvit Avenue. This is good as far as it goes, but that by itself does not constitute a safe route into town.

The junction at the end of Tarvit Drive is one of the most dangerous in Cupar, with traffic approaching from four different directions. This is a very wide junction to cross and the proposed path ends behind a significant pillar, so pedestrians would be stepping out blind into the road. This crossing will need some major re-engineering to make it a safe place to cross.

The railway bridge pavement is too narrow and will need to be widened to comply with current recommended design.

The top of Coal Road needs a pedestrian crossing and should be made one way at the end nearest Pitscottie Road.

This safe route is necessary to access public transport (bus and rail).

Future development

We must not repeat the mistakes of the past. People must be able to walk and cycle through new developments from any future adjacent site. This necessitates multiple path links from the new development to future sites.

The best way to achieve permeability is to run a path around the perimeter of the site with multiple links into the site. For this to be safe to use it must be overlooked by houses.

Crossing roads

One of the most important barriers to sustainable transport is the number of roads that have to be crossed to reach the destination. Paths that cyclists and pedestrians are going to

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use should cross as few roads (and road junctions) as possible. For this reason vehicular links to and from the site should be kept to a minimum.

For this development a second entrance from Pitscottie Road is an unnecessary extra barrier to people walking to town from the adjacent future site.

For this development the vehicular link to the future site to the south is also an unnecessary barrier, because another entrance from Pitscottie Road can easily be added when this area is developed.

Orientation of buildings

Many of the buildings are not oriented as they should be. The objective of orienting buildings to maximise solar gain has been included in the Scottish planning system for some considerable time (SPP Clause 45 being just a recent example).

The recent Paris Agreement on climate change means that within the lifetime of these homes emissions of carbon dioxide due to them will have to fall to zero. The contribution the planning system is allowed to make to this at present is limited, but the orientation of buildings is one thing it certainly can do. The benefit of this is not negligible, and the cost of it is essentially nothing.

It cannot be right to deny this free resource (of passive solar gain) to reduce energy costs for those in need of affordable housing.

Also, well within the lifetime of these homes the cost of electricity from roof mounted PV panels (with battery storage) will likely fall to less than that of grid electricity. To deny the occupants of affordable homes the opportunity for this to reduce their electricity bills does not make sense.

The orientation of homes' windows and roofs should be used to maximise this potential. There is no excuse for this not having been done.

Other objections

Other items that we consider unsatisfactory are:

- There is no provision for a car club on the site.
- There is no provision for future connection to a district heating system.
- The planting on the site is for decorative purposes and not for biodiversity.
- There is no provision of an edible landscape.
- The green networks are separated by unnecessary roads.

Objection basis

Scottish Government Planning Policy (SPP) is crystal clear on the need to encourage sustainable transport.

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> Here is Scottish Government Housing Quality policy document PAN67: "New developments too often fail to create successful streets. The accessibility of many new developments depends too much on the car, and the car is often too dominant in the streetscape. Inadequate attention is given to separate and attractive pedestrian routes and links."

Note the word **separate** in this context.

We refer throughout to *Designing Streets* because planning consultancies will be designing estates throughout Scotland and will therefore use this for reference rather than *Making Fife's Places*.

Please see the following section entitled "The problems with Designing Streets" for background information concerning this important document. It is our contention that Fife Council and housing estate designers rely too much on the guidelines in *Designing Streets* and ignore the superior considerations in Scottish Planning Policy (SPP).

It is easy to see why housing estate developers are keen to embrace *Designing Streets* (and *Making Fife's Places*) because it enables them to cram more houses into a site when they no longer have to allow space for pavements.

Designing Streets is a guideline document that does what it says, it describes how to design a street. What it does not do is prescribe how a rural housing estate should be laid out. Housing estate layout must take into account the superior SPP document, which is the statutory requirement.

> Here is SPP clause 42: "This is development that is attractive to use … by having windows that overlook well-lit streets, paths and open spaces to create natural surveillance. A pleasant, positive sense of place can be achieved by promoting visual quality, encouraging social and economic interaction and activity, and by considering the place before vehicle movement."

Note the inclusion of "**paths**" in the list of items which should be "**overlooked**". It is clear that the SPP is expecting paths to be included with housing developments.

> Here is SPP clause 46: "This is development that considers place and the needs of people before the movement of motor vehicles. It could include using higher densities and a mix of uses that enhance accessibility by reducing reliance on private cars and prioritising sustainable and active travel choices, such as walking, cycling and public transport. It would include paths and routes which connect places directly and which are well-connected with the wider environment beyond the site boundary. This may include providing facilities that link different means of travel."

Note the "It would include **paths** and routes which **connect places directly**". Note also the priority given to sustainable transport over vehicles

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> Here is SPP clause 270: "The planning system should support patterns of development which: optimise the use of existing infrastructure; reduce the need to travel; provide safe and convenient opportunities for walking and cycling for both active travel and recreation, and facilitate travel by public transport; enable the integration of transport modes; and facilitate freight movement by rail or water."

Note the "**safe and convenient opportunities for walking and cycling**".

The emphasis on priority for sustainable transport is stated repeatedly in *Designing Streets* and other documents.

> Here is the *National Planning Framework version 3* clause 5.5: "However, greenhouse gas emissions from the transport sector remain high, generating just under a quarter of Scotland's total emissions. Cycling still only accounts for around 1-2% of our total travel, and car travel continues to rise. We want to significantly increase levels of everyday cycling and walking within and between our settlements, with Action Plans for both Walking and Cycling. The latter sets a vision for of 10% of journeys by bike by 2020 – our substantially increased funding will help to ensure that this vision is realised. We expect action on walking and cycling to extend throughout both urban and rural areas."

Note the "urban and **rural**". This target is never going to be achieved unless new housing estates take walking and cycling seriously and include safe and direct paths for walkers and cyclists that do not cross unnecessary roads.

This last point is emphasised in another document *Let's get Scotland walking (National walking strategy)* which includes:

> "The promotion of walking for children can take place during school, as well as part of travel (walking and cycling) to and from school – 50% of pupils were recorded as walking to school in 201334. Evidence shows that walking to school can improve performance, concentration and learning."

New housing will normally have a large proportion of young families and a safe and convenient walk to the local schools must be a priority.

> This document also says "Walking can help promote a sense of community. Well-connected and attractive public places, routes and streets encourage more people to walk and make active travel choices in their daily routines (e.g. shopping, banking, exercising, meeting people). People and places should be at the heart of the planning and design of town centres, urban areas and rural communities. With a better environment for walking, residential areas will be better places for everybody, enhancing community pride through an increased 'sense of place'.".

This understates the case. People on foot can, and will, talk to each other which is how geographical communities are built. People in cars cannot talk to each other and contribute nothing to community building.

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Later in the same document when considering disincentives to walking and cycling:

> "Physical Barriers which can be influenced include, availability and accessibility of paths, poor quality walking surfaces, nonexistent or inappropriate crossing arrangements …"

Note the "non-existent or **inappropriate crossing arrangements**". This includes crossing a road when there is no need for the road to be there in the first place.

Also in the same document:

> "Practical Barriers … Physical distance to destinations is a barrier in many places."

Having to take a circuitous route because there is no direct path will deter walking.

The problems with Designing Streets

Designing Streets is derived from the older UK government guidelines *Manual for Streets*. This latter document is concerned primarily with city centres and in that context it contains much to be commended. However some of the underlying concerns for city development are not applicable to rural housing and a "one size fits all" approach will not do.

When reading the following please bear in mind this simple fact: paths **connect** communities, roads **separate** communities. Pedestrians and cyclists help to forge links because conversations will take place. Vehicles have the opposite because of their noise, danger and pollution, and the fact that a vehicle isolates the user from their surroundings.

The main source of confusion with the application of *Designing Streets* is the unfortunate use of the word "street" to include paths and roads. The reader automatically assumes that a "street" must have access for vehicles when that is not what is meant.

We want to be very clear here. There is absolutely no published evidence at all that using *Designing Streets* by itself to lay out a rural housing estate will encourage sustainable transport, and plans which fail to take sustainable transport seriously will be in breach of this overriding objective of Scottish Planning Policy.

It should be obvious that if you have to travel the same distance on foot as you would in a car (shared streets) then there will be no incentive for people to walk.

Again, to be crystal clear, we have no problem with the technical aspects of shared street design described in *Designing Streets* but that does not mean that this is the only consideration for housing estate design.

The proponents of shared streets point to a reduction in accidents. It is not clear what the cause of this reduction is, it could be: pedestrians avoiding the street, drivers diverting to other routes, no kerb to fall down; less signs causing obstructions, and so on?

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We accept that shared streets with very little traffic are better than old style roads with pavements. We do **not** accept that shared streets encourage people to walk, and there is no evidence to support this.

Filtered permeability

Designing Streets goes to great lengths to encourage the use of permeability which we support. The emphasis on permeability is vital to produce well connected places and to avoid the mistakes of past developments that were enclaves with only one exit.

Unfortunately it makes no distinction between permeability for vehicles and permeability for sustainable transport. This is a very serious omission because to encourage sustainable transport we need the latter but not the former.

Pedestrians and cyclists must be able to use the most direct (and safe) routes to their destination. The same applies to vehicles **but only if this does not impact adversely on the sustainable routes**.

The solution to this is to use "filtered permeability" which means that interconnecting paths are always there for sustainable transport but roads are often stopped where they would interfere with safe routes for walkers and cyclists.

Cul-de-sac

The issue of culs-de-sac is one of the major causes of confusion from the original *Manual for Streets* which says that "unconventional culs-de-sac are to be avoided" which we agree with. Please note the word "**unconventional**" in this context.

A filtered cul-de-sac with a proper turning point (bulb) is not a conventional cul-de-sac. When discussing culs-de-sac *Designing Streets* says "Through connections for pedestrians and cyclists should be provided where possible but should be wide, well lit and well overlooked with active frontages".

Designing Streets emphasises the need for place making and a filtered cul-de-sac makes a very good place: a place where people feel safe because the only traffic using the road is traffic that has business in the street, and a place where children can safely play in the street. This last point is crucial because it is how communities are cemented together.

Cycling infrastructure

Here we must completely disagree with the sentiment in Designing Streets because it is simply wrong. *Designing Streets* discourages separate cycle paths whereas *Let's get Scotland walking* says "High-quality walking (and cycling) networks across local authority area should be created (on a par with roads development, repair and maintenance) and existing routes promoted effectively".

There is ample published evidence that cyclists are safer, and feel safer, on vehicle free cycle paths. *Designing Streets* says "Cyclists are more likely to choose routes that enable them to

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keep moving. Routes that take cyclists away from their desire lines and require them to concede priority to side-street traffic are less likely to be used. Designs should contain direct, barrier-free routes for cyclists."

Note the "**direct**, **barrier free**" part which cannot be achieved with a grid layout of roads (see later section).

One easy way to achieve usable cycle paths is to put them around the perimeter of the site. This way they do not need to cross any roads, or encounter any road junctions.

Footpath infrastructure

Designing Streets says "Straight streets maximise connections between places and can better serve the needs of pedestrians who prefer direct routes." That is correct, however the suggested layout for roads is that they twist and turn to slow down traffic. We agree that this is necessary on shared streets. The only way to reconcile these two opposing recommendations is to use straight footpaths for the main sustainable desire lines and use shared streets for shorter runs, preferably culs-de-sac.

Perceived safety is an important issue for pedestrians: wide, straight paths are needed to avoid hidden corners where threats can hide, and give long sightlines for surveillance.

Probably the most important sustainable destination is the local schools and we need to consider why many parents do not want their offspring to walk or cycle to school. The main barrier for young pedestrians is the proximity to traffic. This means that pedestrians should not have to encounter roads on their journey except where it cannot be avoided. Where roads are in the way a safe crossing must be provided.

We object strongly to planners who think it is acceptable to put footpaths alongside roads, which is the last place anyone would want to walk with small children.

There is a strong overlap between the needs of pedestrians and the desire for green infrastructure. A footpath or cycle path can double up as a green corridor connecting to green spaces elsewhere.

Grid layout

There is a fundamental problem with the approach to street layout suggested in *Designing Streets*.

The reasons given that grids are desirable is to disperse the traffic and to reduce the carbon used by traffic. These are both important in cities, but neither of them is relevant to rural housing estates on the edge of a small town.

We support a grid layout of footpaths and cycle paths, but a grid layout for vehicles is a disaster because:

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- It means that drivers from other neighbourhoods who you do not know and who have no business in your street will be driving past your front door.
- It means that sustainable routes will have to cross many roads.
- It makes it impossible to bring green routes (wildlife corridors) into the estate.
- It is bad for biodiversity.

Any perceived benefits of a grid layout are far outweighed by the damage to wildlife and sustainable transport routes.

Final thoughts on designing streets

An estate laid out using only *Designing Streets* guidelines (particularly with road grids) will never encourage sustainable transport except with the site itself.

Designing Streets makes no attempt to deal with the vastly different needs of sustainable transport and vehicles, and assumes that they will both use the same infrastructure. This approach leads to some serious contradictions in the guidelines.

The "new urbanism" suggestion for the improved safety of pedestrians (and cyclists) which is to make them walk in the road (no pavements) cannot be taken seriously.

We have repeatedly asked for any published evidence that this approach leads to increased use of sustainable transport and it is clear that there is none.

There is plenty of published evidence that cycling in the road is more dangerous that cycling on separate cycle paths. We are confident that the same results would be found for pedestrians walking in the road.

Using the presence of vulnerable human bodies in the road to slow down traffic will work, but at what cost in deaths and injuries? Will it encourage anyone to walk or cycle? Obviously not!

Shared streets do have a role to play as fairly short filtered (unconventional) culs-de-sac that link into a wider path network.

Plan conclusions

We urge Fife Council to reject these plans on the grounds that they are not compliant with Scottish Planning Policy (SPP):

These plans have ignored the transport hierarchy which is at the heart of *Designing Streets* and will not encourage sustainable transport from this site, and more importantly, from future developments adjacent to the site.

These plans do not include a safe route to the desired destinations: schools, the town centre, the rail station, bus stops.

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We understand that affordable housing is needed urgently and suggest that new plans are drawn up which start by considering pedestrians and cyclists first, and then fit the roads around this:

Better site plan

The addition to the plans of some fairly straight (bearing in mind the contours) greenways for pedestrians and cyclists which will connect to future development and radiate out from the connections to the town would make a huge difference. The removal of the totally unnecessary road links would free up any space lost and save money.

The unnecessary roads are the second entrance from Pitscottie Road and the road link to future development. There are a number of access points that could be used for future development without going through this estate.

Move the main entrance away from the town so that at least the people in this estate do not have to cross it, and retain the other entrance for cyclists only.

More of the buildings should aligned for future use of solar power.

More of the planting should be edible.

Best site plan

There are two conflicting design considerations:

- Pedestrians and cyclists need overlooked, fairly straight, traffic free paths.
- People want easy access to vehicles from their houses.

There are only two ways to solve this dilemma:

- Shared streets. Make everyone use the same routes. This is acceptable when there is limited traffic, for example in a short cul-de-sac. It is a danger to pedestrians and cyclists if there is any through traffic.
- Face the houses onto paths and put the roads at the back of the houses. These back roads can safely be shared (no pavements) because sustainable transport does not have to use them.

It is our view that the second solution is far better, although an estate of any size would probably need to use both solutions.

When redesigning this site we suggest putting the greenways (paths) in first, and face houses onto these paths. These paths then become very safe places for children to play and will help to build a community spirit.

Put in the minimum lengths of roads possible to give vehicular access to the back of the houses. Use filtered bulb culs-de-sac where necessary.

If laid out as we suggest, it will be possible for anyone to leave their house and get to any adjacent site and the town exits without ever encountering a road.

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Reducing the road lengths to a minimum will reduce the distance that service vehicles will need to travel.

Sustainable Cupar would welcome any opportunity to discuss the above with Fife Council officials, elected representatives, and the developers.

Andrew Collins (chair) on behalf of the Sustainable Cupar trustees.

23rd December 2015